



December 2, 2022

Hon. J. Paul Oetken, U.S.D.J.
U.S. District Court for the Southern District of New York
40 Foley Square, Room 2101
New York, NY 10007

RE: *Norman v. Three In One Equities, LLC and Mi Bandera Groceries & Meats Inc.*, Civil Action No. 1:22-cv-03176 (JPO) (OTW)

Dear Judge Oetken,

This firm represents defendant and property owner Three In One Equities, LLC with respect to the above-referenced action filed under the Americans with Disabilities Act. Pursuant to this Court's August 11, 2022 Case Management Order (Dkt. No. 16), the parties hereby submit a joint status report.

With respect to discovery, the parties have exchanged requests for production and interrogatories. Neither side has conducted any depositions.

With respect to settlement, the parties have exchanged draft settlement agreements with respect to monetary compensation and alteration of the premises. The parties have not yet reached any agreement in principle and therefore seek an extension of three months of all pending discovery deadlines in order to complete negotiations.

We appreciate the Court's continued courtesies during the pendency of this matter.

Sincerely,

Katharine S. Santos

Cc: James Bahamonde, Esq. (via NYSCEF)